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through partnership

Steven Cooper

Direct Phone: +1 212 205 6027

Email: scooper@reedsmith.com

Reed Smith LLP  
599 Lexington Avenue  
New York, NY 10022-7650  
+1 212 521 5400  
Fax +1 212 521 5450  
reedsmith.com

February 28, 2022

**By ECF**

The Honorable J. Paul Oetken  
United States District Judge  
United States District Court, Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *Hotel Association of New York City v. City of New York, et al.*, 21-cv-8321 (JPO)**

Dear Judge Oetken:

We represent Plaintiff Hotel Association of New York City (“HANYC”) in the above-referenced matter. We write as a follow-up to our letter to the Court on February 21, 2022, indicating that, on February 17, 2022, the New York Hotel and Motel Trades Council, AFL-CIO (the “Union”) submitted a grievance against the Hyatt Centric Wall Street (“Hyatt”) asserting that the hotel failed to make payments to employees under the Severance Law, and held a mediation on those grounds on February 18, 2022.

On February 23, 2022, the Union indicated that the grievance should be considered withdrawn, and it has now filed a grievance based on the purported failure of the Hyatt to make “settlement payments.”

Respectfully submitted,

/s/ Steven Cooper  
Steven Cooper  
*Counsel for Plaintiff*

cc: Attorneys for Defendant (via ECF)